

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BUSINESS CASUAL HOLDINGS, LLC,)
a Delaware limited liability company,)
Plaintiff,)
v.)
TV-NOVOSTI, a Russian autonomous)
non-profit organization,)
Defendant.)
_____)

Case No.: 1:21-cv-2007-JGK

**DECLARATION OF ALEX EDSON IN SUPPORT OF PLAINTIFF’S APPLICATION
FOR AN ORDER AUTHORIZING ALTERNATIVE SERVICE**

I, Alex Edson, declare as follows:

1. I am the founder and managing officer of Business Casual Holdings, LLC.
2. I have firsthand knowledge of all information contained in this declaration.
3. On January 18, 2021, I received an email from Albina Karyaeva, whose title was listed as Copyright Producer at RT (Russia Today TV) concerning a copyright strike applied to one of Defendant TV-Novosti’s (“Defendant”) many associated YouTube channels as a result of a takedown notification I filed under the DMCA. Karyaeva emailed me from the email address *atkaryaeva@rttv.ru* (“Defendant’s Email Address”).
4. I responded to Karyaeva’s January 18, 2021 email stating “The strike placed on RT is, indeed, legitimate. Your video was a blatant rip-off of my company’s video.” Karyaeva responded in a January 19, 2021 email apologizing for Defendant’s “Yes, you are right. I am terribly sorry about the use of [Business Casual’s] material in

[Defendant's] project . . . without [Business Casual's] permission." Karyaeva also referred to the content copied by Defendant as Plaintiff's "copyrighted material." A true and correct copy of this email exchange is attached hereto as **Exhibit D**.

5. On January 19, 2021, I received another email from Karyaeva stating that Defendant had filed a counter notification to the DMCA takedown notice I had filed, which Karyaeva referred to as a "counterclaim," but that the counter notification had been "sent by mistake." A true and correct copy of this email from Karyaeva is attached hereto as **Exhibit E**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 1, 2021

A handwritten signature in black ink, appearing to be 'AE' or 'Alex Edson', written over a horizontal line.

Alex Edson

Exhibit D

RE: RT.com - strike from Business Casual



 **Karyaeva Albina** <atkaryaeva@rttv.ru>

to me ▾

Tue, Jan 19, 3:23 AM



Dear Alex,

Yes, you are right. I am terribly sorry about the use of your material in our project. Due to an oversight and misunderstanding here, my colleagues used this fragment without your permission. In this respect, we are willing to make this right with you.

We are ready to pull our entire project from circulation and remove your copyrighted material if you retract the strike. Or alternatively, we can discuss the settlement offer. Pls let me know how we can resolve the matter.

Thanks in advance and look forward from hearing from you.

Kind regards,
Albina Karyaeva
Copyright producer
RT (Russia Today TV)
+7 916 356 02 67

From: Alex Edson [alex@casual.yt]

Sent: Monday, January 18, 2021 8:24 PM

To: Karyaeva Albina

Subject: Re: RT.com - strike from Business Casual

Karyaeva,

The strike placed on RT is, indeed, legitimate. Your video was a blatant rip-off of my company's video.

If you disagree, feel free to sue and we will happily see you in court. My company is represented by counsel and we are not afraid to defend ourselves.

Alternatively, if you would like to utilize clips from Business Casual's J.P. Morgan video, we can discuss a licensing agreement.

Exhibit E

RE: RT.com - strike from Business Casual



Karyaeva Albina <atkaryaeva@rttv.ru>

to me ▼

Tue, Jan 19, 6:45 AM



Dear Alex,

Following up my previous email I'd like to add that my colleagues filed a counterclaim by mistake yesterday. So please ignore it.

Kind regards,

Albina Karyaeva

Copyright producer

RT (Russia Today TV)

+7 916 356 02 67